

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Objection Deadline: Pursuant to OST

Hearing Date and Time:

Pursuant to OST

**NOTICE OF DEBTOR'S OMNIBUS MOTION TO COMPEL
IDENTIFIED PLAINTIFF FIRMS TO SUPPLEMENT CERTAIN RESPONSES
TO DEBTOR'S INTERROGATORIES AND REQUESTS FOR PRODUCTION**

PLEASE TAKE NOTICE that, on the date set by the Court pursuant to a proposed Order Shortening Time (the "OST") and Application, as defined below, to be

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

submitted, LTL Management LLC, the above-captioned debtor (the “Debtor”) by and through its proposed counsel, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order, pursuant to Rule 37(a)(3)(B) of the Federal Rules of Civil Procedure, made applicable to this by Rule 7037 of the Federal Rules of Bankruptcy Procedure and Rule 7037-1 of the Local Rules of the United States Bankruptcy Court of the District of New Jersey, for an order compelling the various Plaintiff Firms to supplement their responses to the Debtor’s first set of interrogatories and requests for production (the “Motion”).²

PLEASE TAKE FURTHER NOTICE that, contemporaneously with the filing of the Motion, the Debtor filed an *Application for Order Shortening Time* (the “Application”) requesting that the Court hear its Motion on June 2, 2023, at 10:00 a.m., prevailing Eastern Time.

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-2 and the *Order Establishing Case Management and Administrative Procedures* [Dkt. 554], responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) the Debtor’s undersigned proposed counsel, (b) the proposed counsel to the Official Committee of Talc Claimants, (c) the PSA Law Firms on the Ad Hoc Committee, (d) the legal representative for future talc claimants and her proposed counsel, (e) the Office of the United States Trustee for the District of New Jersey, (f) counsel to the Debtor’s non-debtor affiliates, Johnson & Johnson Holdco (NA) Inc. and Johnson & Johnson and (g) any other party entitled to notice by the time set forth in the Court’s order entered with respect to the Application.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Dated: May 30, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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